UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re A2P SMS ANTITRUST)	Master File: 12 CV 2656 (AJN)
LITIGATION)	
)	ECF Case
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)	
THIS DOCUMENT RELATES TO:)	
ALL ACTIONS)	
)	
)	
)	

DEFENDANTS' NOTICE OF MOTION TO STAY PROCEEDING PENDING ARBITRATION

Defendants Air2Web, Inc., Ericsson Inc., Sybase, Inc., SoundBite Communications, Inc., Syniverse Technologies LLC (f/k/a Syniverse Technologies, Inc.), Vibes Media, LLC, and 3Cinteractive, LLC (the "Aggregator Defendants" or "Aggregators") hereby moves the Court before the Honorable Alison J. Nathan at the United States District Courthouse, 500 Pearl Street, New York, New York, pursuant to 9 U.S.C. § 3, for an order from the Court to Stay Proceedings Pending Arbitration. The claims asserted by Plaintiffs in this case are subject to binding, mandatory arbitration clauses in two separate sets of agreements.

In support of this motion, the Aggregator Defendants rely on the current record and the accompanying Memorandum of Law submitted contemporaneously herewith.

Dated: August 14, 2012 Respectfully submitted,

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